

## Bill Rudow

---

**From:** Janet M. Nesse <jnesse@mhlawyers.com>  
**Sent:** Friday, August 4, 2023 1:41 PM  
**To:** William Rudow; Caroline Kim; Caroline Kim  
**Cc:** Ross Levin; Melissa Niosi; gurzendowski@clatitle.com; Matt Landsberg; kmayo@clatitle.com; Briana L. Genco; jsteinberg@clatitle.com  
**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

As long as we agree that the lien in whatever amount attaches to the proceeds, that is fine.

I understand from your email that you do not believe that it remains on the property and attaches to the property thereby impinging on title

Please confirm

I will, of course, not make any disbursements except by court order

We can work out the details upon your return



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### Janet M. Nesse

Principal

#### McNamee Hosea

6404 Ivy Lane, Suite 820      ☎ 301.441.2420  
Greenbelt, Maryland 20770      📠 301.982.9450

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---

**From:** William Rudow <williamrudow@rudowlaw.com>  
**Sent:** Friday, August 4, 2023 1:15 PM

To: Janet M. Nesse <jnesse@mhlawyers.com>; Caroline Kim <ckim@clatitle.com>

Cc: Ross Levin <ross@romkind.org>; Melissa Niosi <mniosi@clatitle.com>; gurzendowski@clatitle.com; Matt Landsberg <mlandsberg@clatitle.com>; kmayo@clatitle.com; Briana L. Genco <bgenco@mhlawyers.com>; jsteinberg@clatitle.com

Subject: RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Hi Janet,

This is way too complicated for an email. My client is entitled to be paid in full from proceeds of the sale of this subject property by state statute based on the Social Security Act *in addition* to the Court Order.

The Maryland Health General Article allows my client to go back and get additional orders from the Circuit Court, if I need to do so, until my client is paid in full, including its legal fees and post-judgment interest. The Bankruptcy Court Order does not eliminate or modify my client's Health-General claim rights – which are based on Maryland's application of the Federal Social Security Administration Act – so I did not object to it.

I agree that my client's present MD Rules, Rule 3-621 ("Lien") judgment lien was modified/eliminated by the Bankruptcy Court Order, and now attaches to the sale proceeds, so the Lien itself does not cloud the title; but this Lien is *in addition* to my client's inchoate rights. I do not know how you intend to treat my client's additional interest & legal fees. If you intend to use sale proceeds to pay them then, when paid, then the *lis pendens* is terminated when my client receives payment in full. If not, then we will have some very interesting litigation.

My client's rights are not based on a judgment lien, just *enhanced* by a judgment lien. My client's rights do not arise from a contract that was merged into a judgment like most cases. They are statutorily based, presently inchoate, and enforceable – thus the *lis pendens* – until we litigate (or resolve) the issue. You may note that the Court Order actually ordered the sale of the subject property in conformance with my interpretation of my client's rights as opposed to relying on the typical judgment lien based on MD Rules, Rule 3-621. This reflects that my client's rights are something else greater than a simple judgment lien.

Judge Simpson ruled that my client's inchoate rights did not constitute a lien, but were something else, in *In re: Aletha K Barsir* 19-15518. Judge Simpson seemed to me to recognize that any litigation regarding the Maryland Health General Article statute needs to be in the state Circuit Court – as the statute expressly prescribes this.

Warmest regards,

Bill

William M. Rudow, Esquire  
Licensed in MD DC UT

## Rudow Law Group, LLC

502 Washington Avenue, Suite 730

Towson, Maryland 21204

(410) 542-6000 Fax (410) 542-9500

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---

**From:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>

**Sent:** Friday, August 4, 2023 12:37 PM

**To:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>; Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Cc:** Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

How can the lis pendens against the property remain in place when the property has been sold to a third party by court order?.

Perhaps there is something that I am not understanding

Call at convenience

Thank you



---

**Janet M. Nesse**

*Principal*

**McNamee Hosea**

6404 Ivy Lane, Suite 820

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☎ 301.982.9450

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---

**From:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>

**Sent:** Friday, August 4, 2023 12:22 PM

**To:** Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

My apologies, this email confirms that the payment amount was when you intended – which is the amount identified in the Court Order attached; I circled this for your convenient reference. My position on the *lis pendens* remains the same.

Warmest regards,

Bill

William M. Rudow, Esquire  
Licensed in MD DC UT

**Rudow Law Group, LLC**

502 Washington Avenue, Suite 730

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(410) 542-6000 Fax (410) 542-9500

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**From:** William Rudow

**Sent:** Friday, August 4, 2023 11:58 AM

**To:** Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>;

[gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Also the payment was \$1,583.00 too high for what you were trying to pay [see my below email]. Please let me know how you want to handle that.

Warmest regards,

Bill

William M. Rudow, Esquire  
Licensed in MD DC UT

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**From:** William Rudow

**Sent:** Friday, August 4, 2023 11:52 AM

**To:** Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Just confirming that my client's *lis pendens* remains in effect.

Warmest regards,

Bill

William M. Rudow, Esquire  
Licensed in MD DC UT

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---

**From:** William Rudow

**Sent:** Tuesday, July 25, 2023 2:00 PM

**To:** Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Confirmed.

Warmest regards,

Bill

William M. Rudow, Esquire

Licensed in MD DC UT

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Towson, Maryland 21204

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**From:** Caroline Kim <[ckim@clatitle.com](mailto:ckim@clatitle.com)>

**Sent:** Tuesday, July 25, 2023 1:30 PM

**To:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** Re: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Bill,  
Please confirm \$86,079.02 is the final figure and this will be good thru at least 7-31 target settlement date.  
Thank you!

On Tue, Jul 25, 2023 at 1:21 PM William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)> wrote:

I am doing accounting, & just noticed that the Ch 13 Trustee made a disbursement of \$1,583.00 towards this account, so for accurate numbers, please deduct \$1,583.00 from the post-judgment interest - \$5,050.50 = \$3,467.50.

Warmest regards,

Bill

William M. Rudow, Esquire

Licensed in MD DC UT

## **Rudow Law Group, LLC**

**502 Washington Avenue, Suite 730**

**Towson, Maryland 21204**

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---

**From:** William Rudow

**Sent:** Monday, July 24, 2023 6:24 PM

**To:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>

**Cc:** [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>; [ckim@clatitle.com](mailto:ckim@clatitle.com); [jsteinberg@clatitle.com](mailto:jsteinberg@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \* Payoff Request Manor Care\*

Dear Ms. Neese:

As requested, & reserving all rights, I calculate the original judgment plus the state interest plus any attorneys fees awarded as follows:

\$58,365.27      Total Original Judgment

    \$33,764.00 Judgment

\$24,601.27 Judgment Legal Fees

    \$58,365.27

\$5,050.50      State Interest (Post-Judgment) at Legal Rate (10% at \$9.25 per diem on \$33,764.00 for 546 days from 1/24/22 (Judgment Date) to 7/24/23

\$63,415.77 Total Due, with a per diem of \$9.25 from 7-24-23.

\$24,246.25      Post-judgment legal fees.

\$87,662.02 Grand Total.

Warmest regards,

Bill

William M. Rudow, Esquire

Licensed in MD DC UT

## **Rudow Law Group, LLC**

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**Towson, Maryland 21204**

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**From:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>

**Sent:** Monday, July 24, 2023 5:45 PM

**To:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>; Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi

<[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>

Cc: [kmayo@clatitle.com](mailto:kmayo@clatitle.com); Briana L. Genco <[bgenco@mhlawyers.com](mailto:bgenco@mhlawyers.com)>

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \*  
Payoff Request Manor Care\*

Gentlemen:

The liens and orders associated with these health care collection actions and orders are very unusual

I need to see a proposed settlement sheet that shows the proceeds of the transaction if Mr. Rudow is paid the amount of the secured claim, he believes his client has against this property.

There are, of course, other assets to pay creditors in this case.

I need to ensure that the sale does not lead to an estate insolvency as a result of taxes.

If worst comes to worst, I think we should pay the original judgment plus the state interest plus any attorneys fees awarded, and hold the rest until Judge Simpson tells us what to do or we reach an agreement. We would pay real estate taxes and costs of sale at closing as well.

Bill, with no prejudice to all of your client's rights and claims, could you give me a calculation of that amount, just so that I understand what it is.

If there is a shortfall, we could even consider transferring the secured claim to a different property but in any circumstances I think that we need a court order to work this out.

Our mutual aim is to get the properties liquidated to pay claims in their order of priority and this seems like a very good price for this property so I would like to have an agreement of some interim kind before we have our hearing on Thursday morning.



---

**Janet M. Nesse**

*Principal*

**McNamee Hosea**

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Greenbelt, Maryland 20770      📠 301.982.9450

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**From:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>

**Sent:** Monday, July 24, 2023 4:51 PM

**To:** Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com);  
Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \*  
Payoff Request Manor Care\*

Dear Mr. Levin,

You have my client's payoff. I will litigate to enforce the Court ordered *Lis Pendens* and judgment, which, along with MD Code, Health - General, § 19-344(c)(4), I believe supports the claim as I presented it to you.

As I noted below, Janet Neese, Esquire, Chapter 13 Trustee, or The Honorable Lori S. Simpson, will have the final say as to the claim amount.

Warmest regards,

Bill

William M. Rudow, Esquire

Licensed in MD DC UT

## **Rudow Law Group, LLC**

**502 Washington Avenue, Suite 730**

**Towson, Maryland 21204**

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**From:** Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>  
**Sent:** Monday, July 24, 2023 3:27 PM  
**To:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>;  
[gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>  
**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com)  
**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \*  
Payoff Request Manor Care\*  
**Importance:** High

Mr. Rudow:

I am requesting the payoff for the attached judgment recorded in Montgomery County. As you know, the court order approving the sale will require all record liens to be paid to close. The judgment was not for \$87,282.79. I only need the payoff for the judgment plus interest. You will need to speak with Trustee Nesse about the additional amount of your amended proof of claim.

Thank you.

Ross Levin, Certified Housing Counselor

Roots of Mankind Corp.

6305 Ivy Lane

Suite 120

Greenbelt, MD 20770

301-899-6800- agency

202-836-7748- fax

zixsecure

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**From:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>

**Sent:** Monday, July 24, 2023 11:31 AM

**To:** Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>; [gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com);  
Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>

**Cc:** Janet M. Nesse <[jnesse@mhlawyers.com](mailto:jnesse@mhlawyers.com)>; [kmayo@clatitle.com](mailto:kmayo@clatitle.com)

**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \*  
Payoff Request Manor Care\*

Mr. Levin,

I attach Claim 18, which amends Claim 1, also attached, and identifies the amount that ManorCare Bethesda is owed per a judgment lien of \$87,282.79, with a per diem of \$9.25 per after 6-13-23.

Please remember that Janet Neese, Esquire, Interim Trustee, copied here, makes the final decision, subject to Court review, about who gets paid what. Ms. Neese has the right to challenge my client's claim.

I errantly sent claim 19 for ManorCare Wheaton to Kim Mayo, in June, under a cover email that correctly identified the amounts owed under the ManorCare Bethesda claim. Only the ManorCare Bethesda claim is secured by 11229 Empire Ln, Rockville MD 20852-2872 and, is a *lis pendens*, per the attached Court Order.

Warmest regards,

Bill

William M. Rudow, Esquire

Licensed in MD DC UT

## **Rudow Law Group, LLC**

502 Washington Avenue, Suite 730

Towson, Maryland 21204

(410) 542-6000 Fax (410) 542-9500

[WilliamRudow@RudowLaw.com](mailto:WilliamRudow@RudowLaw.com)

[www.RudowLaw.com](http://www.RudowLaw.com)

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**From:** Ross Levin <[ross@romkind.org](mailto:ross@romkind.org)>

**Sent:** Monday, July 24, 2023 10:42 AM

**To:** William Rudow <[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)>; Melissa Niosi <[mniosi@clatitle.com](mailto:mniosi@clatitle.com)>;  
[gurzendowski@clatitle.com](mailto:gurzendowski@clatitle.com); Matt Landsberg <[mlandsberg@clatitle.com](mailto:mlandsberg@clatitle.com)>  
**Subject:** RE: MD-23-19831 / 23-19829 / 1229 Empire Lane Case #22-12609 - CH7 - William C Bevan, Jr. \*  
Payoff Request Manor Care\*

Mr. Rudow:

Kindly provide a written payoff through July 31, 2023, with a per diem for your lien. If you need to reach me, I am available on my cell phone at 240-888-1847. Please reply to all when sending the payoff.

Thank you.



Ross Levin, Certified Housing Counselor

Roots of Mankind Corp.

6305 Ivy Lane

Suite 120

Greenbelt, MD 20770

301-899-6800- agency

202-836-7748- fax

zixsecure

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